

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RALPH “TREY” JOHNSON, et al.,
individually and on behalf of all persons
similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, a/k/a the NCAA, et al.,

Defendants.

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Civil Action No. 2:19-CV-05230-JP

STIPULATION AND
[PROPOSED] ORDER

WHEREAS, pending before the Court are two Motions to Certify Interlocutory Appeals filed on September 29, 2021 (ECF 69) and October 8, 2021 (ECF 72);

WHEREAS, on November 11, 2021, the Court conducted a hearing on said motions, which remain under submission at the time this stipulation is signed;

WHEREAS, on November 22, 2021, a Motion to Approve Stipulation (ECF 93) staying deadlines associated with Defendants' responses to the Second Amended Complaint was filed with the Court;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys
for the parties, as follows:

1. The Second Amended Complaint (ECF 67) was served on the University of Arizona on November 2, 2021 (ECF 89).
2. The undersigned parties agree that no response to that Second Amended Complaint needs be filed before the 30th day following entry of the ruling on the pending motions to certify interlocutory appeal. In the event that the Court enters separate rulings on the two motions, this deadline will be based on entry of the later ruling.

3. If, on the date for a response to the Second Amended Complaint under Paragraph 1, there are pending any motions, petitions, and/or proceedings related to either of the motions for interlocutory appeal of the Court's rulings pending before the Third Circuit, no response to the proposed Second Amended Complaint need be filed until further order of the Court.

4. This Stipulation does not impact Defendant's ability to raise objections to the Second Amended Complaint, including those related to jurisdiction or venue.

Dated: November 24, 2021

WIGDOR LLP

/s/ Michael J. Willemín

Michael J. Willemín
(admitted pro hac vice)
Renan F. Varghese
(admitted pro hac vice)
WIGDOR LLP
85 Fifth Avenue
New York, NY 10003
Telephone: (212) 257-6800
Facsimile: (212) 257-6845

Paul L. McDonald (PA Bar No. 84856)
1800 JFK Boulevard, Suite 300
Philadelphia, PA 19103
Telephone: (267) 238-3835
Facsimile: (267) 238-3801

Counsel for Plaintiff

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Marla N. Presley

Marla N. Presley
PA ID No. 91020
Marla.Presley@jacksonlewis.com
1001 Liberty Avenue, Suite 1000
Pittsburgh, PA 15222
(412) 232-0404 | Telephone
(724) 923-4160 | Facsimile

Counsel for Defendant, University of Arizona

**PURSUANT TO STIPULATION,
IT IS SO ORDERD.**

Dated:

HON. JOHN R. PADOVA
UNITED STATES DISTRICT JUDGE